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BY CM/ECF & FAX

Dennis A. Cipriano, Esq.
200 Executive Drive, Suite 150
West Orange, New Jersey 07052

Mr. Cipriano,

I will call you tomorrow to schedule the depositions of your clients. We can at that time arrange the deposition of my client. I expect resolution on both. If you miss my call, do call me back at the number above.

To save time and our legal fees I propose will depose your clients on the same day at my client's home offices at 493 Teaneck Road in Teaneck at 9AM, 12PM, and 3PM, in your preferred order, and with Mr. Leichter by telephone.

I remind you again that you are past due to provide me initial disclosures and calculation of damages. I do want them already.

You have twice written Judge Checci of not hearing from me. I file my correspondences to you with the Court and you receive electronic notice. So Judge Checci has the many letters to you that you denied receiving. I hope you understand that. If you like I would not mind spending an hour or two to with you to walk you through the technology.

Every letter from you has a warning on sanctions. They are unpleasant, tiring and needlessly excite clients. To date, only you have violated your discovery obligations.

As neither of us has fooled Judge Checci, I propose we get this done.

Sincerely,



Michael M. Cohen

MMC/xaj